

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,
Plaintiffs,

v.

GREG ABBOTT, *et al.*,
Defendants.

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Case No. 5:21-cv-844-XR
[LEAD CASE]

STATE DEFENDANTS' SUPPLEMENTAL DISCLOSURES

To: The LUPE Plaintiffs, by and through their attorney of record, Nina Perales, Mexican American Legal Defense and Education Fund, 110 Broadway, Suite 300, San Antonio, TX 78205; The OCA-Greater Houston Plaintiffs, by and through their attorney of record, Mimi Marziani, Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741; The Houston Justice Plaintiffs, by and through their attorney of record, Sarah M. Cummings, Reed Smith LLP, 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201; The LULAC Plaintiffs, by and through their attorney of record, John R. Hardin, Perkins Coie LLP, 500 North Akard Street, Suite 3300, Dallas, Texas 75201-3347; and The Mi Familia Vota Plaintiffs, by and through their counsel of record, Sean Lyons, Lyons & Lyons, P.C., 237 W. Travis Street, Suite 100, San Antonio, Texas 78205; The United States, by and through its attorney of record, Daniel J. Freeman, Civil Rights Division, U.S. Department of Justice, 950 Pennsylvania Ave, NW, Washington, DC 20530.

Texas Governor Greg Abbott, Secretary of State John Scott, and Attorney General Ken Paxton, each in his official capacity, and the State of Texas (collectively, “State Defendants”) submit these supplemental disclosures in accordance with Rule 26(a)(1) of the Federal Rule of Civil Procedure. State Defendants make these disclosures subject to pending motions to dismiss and do not concede the viability of any claim against any State Defendant. Nor does any State Defendant waive any protections provided by the attorney work-product protection, attorney–client privilege, or any other applicable privilege, protection, doctrine, or immunity. State Defendants reserve the right to supplement these Supplemental Disclosures as additional discovery, investigation, and analysis may warrant. State Defendants likewise do not waive the right to object, on any grounds, to the evidentiary use of the information contained in these Disclosures or discovery requests relating to these

Disclosures.

STATE DEFENDANTS' SUPPLEMENTAL INITIAL DISCLOSURES

- I. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support his or her claims or defenses, unless the use would be solely for impeachment.**

A. Primary Individuals (Tier 1)

The following persons may have discoverable information related to the claims and defenses at issue in these cases, including but not limited to the laws and procedures challenged in this case, the administration of Texas elections, the prevalence of actionable election misconduct in Texas, and the deviations from common practice that took place in the November 2020 election.

Individual	Subject of Information
Keith Ingram c/o Patrick K. Sweeten Office of the Attorney General P.O. Box 12548 (MC-076) Austin, TX 78711-2548 (512) 936-1414	Mr. Ingram is the Director of the Office of the Texas Secretary of State, Elections Division. He also testified before the Legislature during the consideration of S.B. 1. He may have discoverable information on the claims and defenses at issue in these cases. Mr. Ingram may be contacted through the counsel of record for State Defendants.
Jonathan White c/o Patrick K. Sweeten Office of the Attorney General P.O. Box 12548 (MC-076) Austin, TX 78711-2548 (512) 936-1414	Mr. White is the Chief of the Office of the Attorney General of Texas, Elections Integrity Division. He also testified before the Legislature during the consideration of S.B. 1. He may have discoverable information on the claims and defenses at issue in these cases. He may have information regarding election-related investigations and prosecutions, to the extent those materials are not privileged. Mr. White may be contacted through the counsel of record for State Defendants.
Chris Hollins	Mr. Hollins is the former Harris County Clerk. He may have discoverable information on voting practices related to S.B. 1. State Defendants do not have

	contact information for Mr. Hollins.
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B. Secondary Individuals (Tier 2)

State Defendants incorporate by reference the Secondary Individuals (Tier 2) included in their Amended Initial Disclosures, ECF 135, except for for Jonathan White, who was previously a Tier 2 individual, but has now been disclosed under Tier 1, *see supra*. The following additional persons may have discoverable information related to the allegations set forth in Plaintiffs' live pleading and the defenses at issue in these cases, including but not limited to the legislative passage of S.B. 1, the prevalence of actionable election misconduct in Texas, the administration and enforcement of Texas elections, standing, and any disability-based claim.

Individual	Subject of Information
Custodian of Records Texas Senate	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records Texas House of Representatives	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records Hidalgo County District Attorney 100 E. Cano Street Edinburg, TX 78539	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Corporate Representative Texas Office of the Attorney General 300 W. 15th Street Austin, TX 78701	The corporate representative was deposed by the consolidated plaintiffs in this action and may have knowledge of facts related to that testimony. The corporate representative can be contacted by and through counsel of record.
Juanita Valdez Cox	State Defendants deposed Ms. Valdez Cox, who served as the corporate representative for LUPE. Ms. Valdez Cox can be contacted by and through her counsel.
Corporate Representative for LULAC	State Defendants and LULAC have agreed to an out-of-time deposition of LULAC's yet-to-be-identified corporate representative. LULAC's corporate representative can be contacted by and through his counsel.
Deborah Chen	State Defendants deposed Ms. Chen, who served as the corporate representative for OCA-Greater Houston. Ms. Chen can be contacted by and through her counsel.
Angelica Razo	State Defendants deposed Ms. Razo, who served as the corporate representative for Mi Familia Vota. Ms. Razo can be contacted by and through her counsel.
Jennifer Martinez	State Defendants deposed Ms. Razo, who served as the corporate representative for The Arc of Texas. Ms. Martinez can be contacted by and through her counsel.
Emily Timm	State Defendants deposed Ms. Timm, who served as the corporate representative for Workers Defense Action Fund. Ms. Timm can be contacted by and through her counsel.

Ray Shackelford	State Defendants deposed Mr. Ray Shackelford, who served as the corporate representative for Houston Area Urban League. Mr. Schackelford can be contacted by and through his counsel.
Bob Kafka	State Defendants deposed Bob Kafka who served as the corporate representative for REVUP. Mr. Kafka can be contacted by and through hiss counsel.
Grace Chimene	State Defendants deposed Grace Chimene, who served as the corporate representative for League of Women Voters. Ms. Chimene can be contacted by and through her counsel.
Corporate Representative for Delta Sigma Theta	State Defendants deposed the corporate representative of Delta Sigma Theta. The corporate representative can be contacted by and through her counsel.
Bridgette Escobedo	State Defendants deposed Ms. Bridgette Escobedo, who served as a corporate representative for the Travis County Clerk Office. Ms. Escobedo can be contacted by and through her counsel.
Dan Hayes	State Defendants deposed Mr. Dan Hayes, who served as a corporate representative for the Travis County Clerk Office. Mr. Hayes can be contacted by and through his counsel.
Charlie Johnson	State Defendants deposed Mr. Charlie Johnson, who served as a corporate representative for the Travis County Clerk Office. Mr. Johnson can be contacted by and through his counsel.
Rivelino Lopez	State Defendants deposed Mr. Rivelino Lopez, who served as a corporate representative for the Office of the Dallas County Election Administrator. Mr. Lopez can be contacted by and through his counsel.
Tacoma Phillips	State Defendants deposed Mr. Tacoma Phillips, who served as a corporate representative for the Office of the Dallas County Election Administrator. Ms. Phillips can be contacted by and through her counsel.

Remi Garza	State Defendants deposed Ms. Remi Garza, who serves as the Election Administrator for Cameron County. Ms. Garza can be contacted by and through his counsel.
Representative Rafael Anchia	The State Defendants intend to depose Representative Anchia as he may have knowledge of facts related to the passage of S.B. 1. He can be contacted through his counsel, Sean McCaffity, located at 3811 Turtle Creek Lane, Suite 1400, Dallas, TX 75219.
Wendy Salome	State Defendants deposed Ms. Wendy Salome about her alleged injury under S.B. 1. She can be contacted by and through her counsel.
Tanesa Lee	Tanesa Lee may have information related to the impact of S.B. 1 on election judges and poll workers. She can be contacted by and through her counsel.
Dr. Kara B. Ayers	This person submitted an expert report in this case.
Dr. William G. Eggington	This person submitted an expert report in this case.
Dr. Eitan Hersh	This person submitted an expert report in this case.
Tammy Patrick	This person submitted an expert report in this case.
Dr. Douglas L. Kruse	This person submitted an expert report in this case.
Dr. J. Morgan Kousser	This person submitted an expert report in this case.
Dr. Daniel A. Smith	This person submitted an expert report in this case.
Dr. Allen Lichtman	This person submitted an expert report in this case.
Dr. Kenneth R. Mayer	This person submitted an expert report in this case.
Dr. Loren Collingwood	This person submitted an expert report in this case.
Dr. Andres Tijerina	This person submitted an expert report in this case.

Dr. Eric McDaniel	This person submitted an expert report in this case.
Dr. Franita Tolson	This person submitted an expert report in this case.
Christian R. Grose	This person submitted an expert report in this case.
Dr. Henry Flores	This person submitted an expert report in this case.
Mark Hoekstra	This person submitted an expert report in this case.
Stephen C. Graves	This person submitted an expert report in this case.
Sheri Gipson Chief Driver License Division Texas Department of Public Safety 5805 North Lamar Austin, TX 78752	Sheri Gipson is an employee with the Texas Department of Public Safety (DPS) and was deposed in this case. She may have knowledge of facts related to the operation and maintenance of DPS's database. She can be contacted by and through her counsel.
Kristi Hart Manager Elections Administration & Voter Registration 1019 Brazos Street Austin, TX 78701	Kristi Hart is an employee with the Texas Secretary of State and may have knowledge of facts related to Texas Election Administration Management system. She can be contacted by and through her counsel.
Christina Adkins Legal Director Elections Division 1019 Brazos Street Austin, TX 78701	Christina Adkins is an employee with the Texas Secretary of State and may have knowledge of facts related to implementation of S.B. 1. She can be contacted by and through her counsel.
Senator Paul Bettencourt 11451 Katy Freeway, Suite 209 Houston, TX 77079	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Brian Birdwell 900 Austin Avenue, Suite 500 Waco, TX 76701	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Dawn Buckingham 4400 Buffalo Gap Road, Suite 0400 Abilene, TX 79606	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Donna Campbell 229 Hunters Village Hunters Village, Suite 105 New Braunfels, TX 78132	This person may have discoverable information regarding the legislative passage of S.B. 1.

Senator Brandon Creighton 350 Pine Street, Suite 1450 Beaumont, TX 77701	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Bob Hall Alliance Building #2 6537 Horizon Road, Suite B-1 Rockwall, TX 75032	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Joan Huffman 2900 Wesleyan Street, Suite 500 Houston, TX 77027	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Lois Kolkhorst 2000 S. Market St. #101 Brenham, TX 77833	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Jane Nelson 1225 S. Main Street, Suite 100 Grapevine, TX 76051	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Robert Nichols 329 Neches Street Jacksonville, TX 75766	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Angela Paxton 604 S. Watters Road, Suite 100 Allen, TX 75013	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Charles Perry 11003 Quaker Avenue, #101 Lubbock, TX 79424	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Charles Schwertner 3000 Briarcrest Drive, Suite 202 Bryan, TX 77802	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Drew Springer 100 Austin Ave., Suite 103 Weatherford, TX 76086	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Larry Taylor 6117 Broadway, Suite 122 Pearland, TX 77581	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative J.M. Lozano 1512 Wildcat Dr., Suite 100 Portland, TX 78734	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Travis Clardy 202 East Pilar, Room 310 Nacogdoches, TX 75961	This person may have discoverable information regarding the legislative passage of S.B. 1.

Representative James White 205 N. Charlton Street Woodville, TX 75979	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Jacey Jetton 1108 Soldiers Field Drive, Suite 100 Sugarland, TX 77479	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Steve Allison 1635 NE Loop 410, Suite 506 San Antonio, TX 78209	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Charles Anderson 900 Austin Avenue, Suite 804 Waco, TX 76701	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Trent Ashby 2915 Atkinson Drive Lufkin, TX 75901	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Ernest Bailes 10501 Hwy 150, Suite B Shepherd, TX 77371	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Keith Bell 100 E. Corsicana Street, Suite 204 Athens, TX 75751	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Kyle Biedermann 616 W. Main Street Suite 101, 101A, 102 Fredericksburg, TX 78624	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Greg Bonnen 174 Calder Road, Suite 116 League City, TX 77573	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Brad Buckley 1301 North Stagecoach Road Salado, TX 76571	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative DeWayne Burns 114 S. Main Street, Suite 202 Cleburne, TX 76033	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Dustin Burrows 10507 Quaker Avenue, Suite 103 Lubbock, TX 79424 Representative Angie Chen Button 1201 International Pkwy #130 Richardson, TX 75081	This person may have discoverable information regarding the legislative passage of S.B. 1.

Representative Briscoe Cain 606 Rollingwood Drive, Suite 1E Baytown, TX 77521	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Giovanni Capriglione 1100 Bear Creek Parkway Keller, TX 76248	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Jeff Cason 1600 Airport Fwy, Suite 370 Bedford, TX 76022	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative David Cook 309 E. Broad Street Mansfield, TX 76063	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative John Cyrier 1017 Main Street Bastrop, TX 78602	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Drew Darby 36 W. Beauregard, Suite 517 San Angelo, TX 76903	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Jay Dean 101 E. Methvin, Suite 103 Longview, TX 75601	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Jake Ellzey 2340 Interstate 20 W., Suite 224 Arlington, TX 76017	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative James Frank 1206 Hatton Road Wichita Falls, TX 76302	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative John Frullo 5717 66th Street, Suite 116–117 Lubbock, TX 79424	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Craig Goldman 4521 South Hulen Street, Suite 208 Fort Worth, TX 76109	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Sam Harless 6630 Cypresswood Drive, Suite 150 Spring, TX 77379	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Cody Harris 214 E. Elm Street Hillsboro, TX 76645	This person may have discoverable information regarding the legislative passage of S.B. 1.

Representative Cole Hefner 115 W. 1st Street Mount Pleasant, TX 75455	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Justin Holland 101 E. Rusk Street #201 Rockwall, TX 75087	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Dan Huberty 4501 Magnolia Cove Drive, #201 Kingwood, TX 77345	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Kyle Kacal 3000 Briarcrest Drive, Suite 203 Bryan, TX 77802	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Phil King Nan and Bob Kingsley Building 1710 Martin Drive Weatherford, TX 76086	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Stephanie Klick 6851 NE Loop 820, Suite 230 North Richland Hills, TX 76180	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Matt Krause 1949 Golden Heights Rd., Suite 106 Fort Worth, TX 76177	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative John Keumpel 200 N. River Street, #100-E Seguin, TX 78155	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Stan Lambert 547 Chestnut Abilene, TX 79602	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Brooks Landgraf 119 W. 4th St., Suite 206 Odessa, TX 79761	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Jeff Leach 550 S. Watters Road, Suite 280 Allen, TX 75013	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Ben Leman 401 South Austin Street Brenham, TX 77833	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Will Metcalf 1835 Spirit of Texas Way, Suite 100 Conroe, TX 77301	This person may have discoverable information regarding the legislative passage of S.B. 1.

Representative Morgan Meyer 3131 McKinney Avenue #649 Dallas, TX 75204	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Mays Middleton 2101 Mechanic Street, Suite 245 Galveston, TX 77550	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Geanie Morrison 1908 N. Laurent, Suite 500 Victoria, TX 77901	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Jim Murphy 9525 Katy Freeway, Suite 215 Victoria, TX 77901	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Candy Noble 206 North Murphy Road Murphy, TX 75094	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Tom Oliverson 12345 Jones Road #221 Houston, TX 77070	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Chris Paddie 102 West Houston Street Marshall, TX 75670	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Tan Parker 800 Parker Square, Suite 245 Flower Mound, TX 75028	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Jared Patterson 5533 FM 423, Suite 503 Frisco, TX 75034	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Dennis Paul 17225 El Camino Real Blvd, Suite 415 Houston, TX	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Four Price Amarillo National Bank Plaza Two, Suite 506 500 S. Taylor Street Amarillo, TX 79101	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative John Raney 4103 South Texas Avenue, Suite 103 Bryan, TX 77802	This person may have discoverable information regarding the legislative passage of S.B. 1.

Representative Glenn Rogers 600 E Depot Street Brownwood, TX 76801	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Scott Sanford 115 West Virginia Street, Suite #103 McKinney, TX 75069	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Matt Schaefer 200 E. Ferguson St., Suite 506 Tyler, TX 75702	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Matt Shaheen P.O. Box 2910 Austin, TX 78768	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Hugh Shine 4 South 1st Temple, TX 76501	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Bryan Slaton P.O. Box 2910 Austin, TX 78768	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Shelby Slawson PO Box 286 Stephenville, TX 76401	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Reggie Smith 421 N. Crockett Street Sherman, TX 75090	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative John Smithee 320 S. Polk, 1st Floor Amarillo, TX 79101	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative David Spiller PO Box 447 Jacksboro, TX 76458 (512) 463-0526	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Phil Stephenson 834 Third Street Rosenberg, TX 77471	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Lynn Stucky 400 West Oak Street, Suite 106 Denton, TX 76201	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Valoree Swanson 230008 Northcrest Drive Spring, TX 77389	This person may have discoverable information regarding the legislative passage of S.B. 1.

Representative Ed Thompson 2341 N. Galveston Avenue, Suite 120 Pearland, TX 77581	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Tony Tinderholt 4381 W. Green Oaks Boulevard, Suite 107 Arlington, TX 76016	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Steve Toth 25700 Interstate Hwy 45, Suite 100 Spring, TX 77386	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Gary VanDeaver 710 James Bowie Drive New Boston, TX 75570	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Cody Vasut 222 N Velasco Street, Suite 25 Angleton, TX 77515	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Terry Wilson 710 Main Street, Suite 242 Georgetown, TX 78626	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Eddie Lucio 1324 E. Madison Street Brownsville, TX 78520	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Beverly Powell 1612 Summit Avenue, Suite 101 Fort Worth, TX 76102	This person may have discoverable information regarding the legislative passage of S.B. 1.
Senator Judith Zaffirini 1407 Washington Street Laredo, TX 78040	This person may have discoverable information regarding the legislative passage of S.B. 1.
Vice Chairwoman Senfronia Thompson 10527 Homestead Road Houston, TX 77016	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative John Bucy III 3016 Polar Lane Suite 108 Cedar Park, TX 78613	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Charlie Geren 6713 Telephone Road Suite 301 Lake Worth, TX 76135	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Ann Johnson 5601 West Loop S, Suite C218 Houston, TX 77081	This person may have discoverable information regarding the legislative passage of S.B. 1.

Representative Oscar Longoria 1320 S. Main Street Peñitas, TX 78576	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Joe Moody 7365 Remcon Circle C-301 El Paso, TX 79912	This person may have discoverable information regarding the legislative passage of S.B. 1.
Vice Chairwoman Jessica Gonzalez 400 South Zang Boulevard, Suite 1214 Dallas, TX 75208	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Michelle Beckley 3740 N Josey Lane, Suite 136 Carrollton, TX 75007	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Art Fierro 1790 Lee Trevino Drive, Suite 307 El Paso, TX 79936	This person may have discoverable information regarding the legislative passage of S.B. 1.
Representative Mike Schofield 1550 Foxlake Drive, Suite 120 Houston, TX 77084	This person may have discoverable information regarding the legislative passage of S.B. 1.
Omar Escobar, Jr.	Mr. Escobar is the former district attorney of Starr County. He may have discoverable information on the investigation and prosecution of election fraud and other misconduct. State Defendants do not have contact information for Mr. Escobar.
Lina Hidalgo	Ms. Hidalgo is the Harris County Judge. She may have discoverable information on the creation and implementation of novel voting practices, and on voting irregularities.
Jeffrey Lamar Clemmons	Mr. Clemmons is a plaintiff in one of the consolidated cases and has knowledge regarding the allegations set forth in the Plaintiffs' live pleading. He can be contacted through his counsel of record.
Rebecca Guerrero	Ms. Guerrero, in her official capacity as a county election official, is a defendant in two of the consolidated cases and may have knowledge regarding the allegations set forth in Plaintiffs' live pleading. State Defendants deposed Ms. Rebecca Guerrero pursuant to her role as County Clerk for Travis County. Ms. Guerrero can be contacted by and through her counsel.

Dana DeBeauvoir	Ms. DeBeauvoir was the County Clerk of Travis County during the November 2020 and may have discoverable information about election practices and procedures related to S.B. 1. She also oversaw the law's early implementation in Travis County. The State Defendants deposed Ms. DeBeauvoir on these topics. She may be contacted by and through counsel.
Custodian of Records La Unión Del Pueblo Entero	This person has information that can lay the foundation for establishing the authenticity of admissible evidence.
Custodian of Records Friendship-West Baptist Church	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records Anti-Defamation League Austin, Southwest, and Texoma Regions	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records Southwest Voter Registration Education Project	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records Texas Impact	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records Mexican American Bar Association of Texas	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records Texas Hispanics Organized for Political Education	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records Jolt Action	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records William C. Velasquez Institute	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records FIEL	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records LULAC Texas	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.

Custodian of Records Voto Latino	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records Texas Alliance for Retired Americans	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records Texas AFT	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records Mi Familia Vota	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records OCA-Greater Houston	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records League of Women Voters of Texas	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records REVUP Texas	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records Workers Defense Action Fund	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records Houston Area Urban League	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records Delta Sigma Theta Sorority Inc.	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
Custodian of Records The Arc of Texas	This person has information that can lay the evidentiary foundation for establishing the authenticity of admissible evidence.
All individuals identified in documents produced through the discovery process	
All individuals or corporate representatives deposed through the discovery process	
All individuals identified by or to deponents through deposition	

All individuals identified in supplemental disclosures by any named party	
All individuals identified in Plaintiffs' live Complaint	
Contact information for the following individuals is publicly available: 1. All Texas County Chairs 2. All Texas County Election Officials 3. All Texas County Judges	

In addition, the Entity Plaintiffs in this case have knowledge regarding the allegations set forth in Plaintiffs' live pleadings. State Defendants therefore incorporate by reference those individuals identified by the Entity Plaintiffs in their Rule 26(a)(1) Initial Disclosures and Amended Initial Disclosures as having information related to the Entity Plaintiffs' mission, history, operations, membership, programs and activities, finances and expenses, and purported injuries, along with any individual identified as a corporate representative of the Entity Plaintiffs through the course of this litigation.

C. Tertiary Individuals (Tier 3)

Individuals within the following categories of persons may have discoverable information related to the claims and defenses at issue in these cases.

1. The State Representatives and Senators who authored, co-authored, sponsored, or co-sponsored S.B. 1 or the three predecessor bills may have discoverable information on the legislative process related to the passage of S.B. 1. Their contact information is a matter of public record and is available at [https:// txdirectory.com](https://txdirectory.com) and in State Defendants' previous filings. *See* ECF 112.
2. The State Representatives and Senators who were members of the Senate State Affairs Committee, the House Elections Committee, or the House Select Committee on Constitutional Rights and Remedies during the consideration of S.B. 1 and the three predecessor bills listed above may have discoverable information on the legislative process related to the passage of S.B. 1 and, specifically, on hearings conducted on those bills. Their contact information is a matter of public record and is available at <https://txdirectory.com> and in State Defendants' previous filings. *See* ECF 112.

3. Witnesses who testified for, against, or on S.B. 1 may have discoverable information that relates to the claims and defenses at issue in this litigation, particularly as pertains to the reasons that members of the public supported or opposed to the legislation. Lists of the witnesses who testified during the consideration of S.B. 1 were previously disclosed by State Defendants and can be found in the case docket. *See* ECF 116–17. State Defendants do not have the contact information for these persons at this time.
4. All unidentified members, supporters, clients, and constituents of the Entity Plaintiffs, as well as all the unidentified members of the Entity Plaintiffs’ leadership may have discoverable information that relates to the claims and defenses at issue in this litigation, particularly as it pertains to standing and any disability-based claim. These individuals may be contacted through the Entity Plaintiffs’ counsel of record.
5. To the extent that any of the Individual Plaintiffs or any of the members of Entity Plaintiffs have qualifying disabilities under the ADA or the Rehabilitation Act or require assistance voting by reason of blindness or disability under Section 208 of the VRA, those persons’ physicians have discoverable information on their patients’ disability or blindness and their treatment history. State Defendants do not have contact information for these persons at this time.
6. To the extent that any of the Individual Plaintiffs or any of the members of Entity Plaintiffs require assistance voting because he or she is unable to read or write, those persons have discoverable information regarding educational records, and education history. State Defendants do not have contact information for these persons at this time.
7. There may be discoverable information related to the claims and defenses at issue in these cases in the possession of unnamed local election officials throughout the State of Texas, including but not limited to county clerks, county tax assessor-collectors, county election administrators, county commissioners, county judges, the county chairs of political parties, city secretaries, any person acting as the early voting clerk, members of early voting ballot boards, members of signature-verification committees, presiding judges, alternate presiding judges, election clerks, poll watchers, and district attorneys. State Defendants do not have contact information for these persons at this time.
8. State Defendants incorporate by reference any individual or entity, not previously named or mentioned herein, identified by the other Parties to this consolidated action in their Rule 26(a)(1) Initial Disclosures, Amended Initial Disclosures, and Supplemental Disclosures.

II. A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in his or her possession, custody, or control and may use to support his or her claims or defenses, unless the use would be solely for impeachment.

A. Legislative History Compilations

State Defendants previously produced and filed with the court a compilation of legislative-history materials for S.B. 1 (2d Special Session), S.B. 1 (1st Special Session), S.B. 7 (Regular Session),

and H.B. 6 (Regular Session). All of these documents can be accessed through the case docket. *See* ECF 116–17. They are also made publicly available by Texas Legislature at <https://capitol.texas.gov/Home.aspx>.

In addition to the aforementioned legislative materials, legislative-history materials for H.B. 3 (First Special Session), S.B. 331 (Regular Session), and S.B. 1509 (Regular Session) are public available at the official website for the Texas Legislature. Specifically, a compilation of those materials is available online at the following locations:

- H.B. 3 – <https://capitol.texas.gov/BillLookup/History.aspx?LegSess=871&Bill=HB3>
- S.B. 331 – <https://capitol.texas.gov/BillLookup/History.aspx?LegSess=87R&Bill=SB331>
- S.B. 1509 – <https://capitol.texas.gov/BillLookup/History.aspx?LegSess=87R&Bill=SB1509>

State Defendants specifically reserve the right to amend or supplement these disclosures as they identify additional documents, testimony, and legislation that relate to the passage of S.B. 1.

B. Bill Analyses

Bill analyses of S.B.1 and its predecessor bills including analyses of their impact on state operations. Documents relating to these assessments have been produced by State Defendants. *See* ECF 116–17. In addition to the previously produced bill analysis, please find supplemental materials online at the following locations:

- H.B. 3 – <https://capitol.texas.gov/tlodocs/86R/analysis/html/HB00003S.htm>
- S.B. 331 – <https://capitol.texas.gov/tlodocs/87R/analysis/html/SB00331H.htm>
- S.B. 1509 – <https://capitol.texas.gov/tlodocs/87R/analysis/html/SB01509S.htm>

State Defendants reserve claims of privilege and protections provided by the attorney work-product protection; attorney-client privilege; or any other applicable privilege, protection, doctrine, or immunity related to these materials.

C. Election Complaints

Election complaints may be submitted to the Secretary of State. If, after receiving a complaint alleging criminal conduct in connection with an election, SOS determines that there is reasonable cause to suspect that the alleged criminal conduct occurred, SOS shall refer the complaint to the Attorney General for further investigation and possible prosecution. Documents relating to these complaints have been produced by State Defendants. *See, e.g.*, STATE032025–STATE 032082. In addition, State Defendants produced a chart from the Office of the Attorney General of Texas that lists pending and resolved prosecutions for election fraud violations, *see* STATE001144–STATE001159 and STATE087323–STATE087339, as well as a chart from the Office of the Attorney General of Texas that lists election fraud complaints that were referred by the Office of the Secretary of State, STATE107717-STATE107732. State Defendants may rely on these charts or on any publicly available information related to the investigations listed. Finally, State Defendants may also rely on any publicly available documents related to investigations or prosecutions of election crimes by any county attorney or district attorney in any Texas county, including but not limited to Bexar, Dallas, El Paso, Harris, Hidalgo, Travis County. State Defendants reserve claims of privilege and any protections provided by the attorney work-product protection; attorney-client privilege; investigative privilege; or any other applicable privilege, protection, doctrine, or immunity related to these materials.

D. Revised Forms

The Office of the Secretary of State has created or revised election-related forms in accordance with S.B. 1. State Defendants have produced copies of many of these forms in this litigation, including Form Nos. 4-20, 4-21, 5-6, 5-21, 6-2, 6-3, 6-4, 6-6, 6-7, 6-12, 6-13, 6-15, 6-16, 6-17, 6-19, 6-35, 6-36, 7-7, 7-13, 7-14, 7-58, 7-59, 7-80, 8-24, 13-1, 13-6, and 13-7. State Defendants may rely on these forms or on any other publicly available form located at <https://www.sos.texas.gov/elections/forms/pol-sub/index.shtml>. State Defendants reserve claims of privilege and any protections provided by the

attorney work-product protection; attorney-client privilege; or any other applicable privilege, protection, doctrine, or immunity related to these materials.

E. Advisory Materials

The Office of the Secretary of State has issued election advisories and other guidance materials, and given presentations, to election officials that summarized the election-related legislation enacted in 2021. State Defendants have produced multiple advisories in this litigation, including Election Advisory Nos. 2021-03, 2021-04, 2021-05, 2021-09, 2021-10, 2021-11, 2021-12, 2021-13, 2021-14, 2021-21, 2021-24, 2022-01, 2022-02, 2022-03, 2022-04, 2022-05, 2022-06, 2022-07, 2022-08, 2022-09, 2022-10, 2022-12, 2022-13, 2022-14, 2022-16, 2022-18, 2022-19, and 2022-20. State Defendants may rely on these advisories or on any other publicly available election advisory located at <https://www.sos.state.tx.us/elections/laws/election-division-advisories.shtml>. State Defendants reserve claims of privilege and any protections provided by the attorney work-product protection; attorney-client privilege; or any other applicable privilege, protection, doctrine, or immunity related to these materials.

F. Other Documents

State Defendants may rely on any publicly available document maintained by any election administrator or county clerk in any county in Texas, including but not limited to Bexar, Dallas, El Paso, Harris, Hidalgo, Travis county. Additionally, State Defendants may rely on any document or communication produced in response to party discovery requests and Rule 45 subpoenas. *See* STATE000001–STATE107845 and TXLEG0000001–TXLEG00004666. State Defendants reserve claims of relevance, privilege, and any protections provided by the attorney work-product protection; attorney-client privilege; legislative privilege; investigative privilege; deliberative process privilege; or any other applicable privilege, protection, doctrine, or immunity related to these materials

Documents listed below are identified by source. Each of the documents below have been received through the discovery process or have otherwise been publicly available throughout the litigation process and accessible to all named parties.

Defendant Lupe C. Torres	All documents produced in response to discovery requests
Defendant Jacque Callanen	All documents produced in response to discovery requests
Defendant Isabel Longoria	All documents produced in response to discovery requests
Defendant Rebecca Guerrero	All documents produced in response to discovery requests
Defendant Dana DeBeauvoir	All documents produced in response to discovery requests
Defendant Lisa Wise	All documents produced in response to discovery requests
Defendant Michael Scarpello	All documents produced in response to discovery requests
Defendant Yvonne Ramon	All documents produced in response to discovery requests
Plaintiff Jeffrey Lamar Clemmons	All documents produced in response to discovery requests
Plaintiff Isabel Longoria	All documents produced in response to discovery requests
Plaintiff James Lewin	All documents produced in response to discovery requests
Plaintiff Marla Lopez	All documents produced in response to discovery requests
Plaintiff Marlon Lopez	All documents produced in response to discovery requests
Plaintiff Paul Rutledge	All documents produced in response to discovery requests
Plaintiff La Union Del Pueblo Entero	All documents produced in response to discovery requests
Plaintiff Friendship-West Baptist Church	All documents produced in response to discovery requests
Plaintiff Anti-Defamation League Austin, Southwest, and Texoma Regions	All documents produced in response to discovery requests
Plaintiff Southwest Voter Registration Education Project	All documents produced in response to discovery requests
Plaintiff Texas Impact	All documents produced in response to discovery requests
Plaintiff Mexican American Bar Association of Texas	All documents produced in response to discovery requests

Plaintiff Texas Hispanic Organized for Political Education	All documents produced in response to discovery requests
Plaintiff Jolt Action	All documents produced in response to discovery requests
Plaintiff William C. Velasquez Institute	All documents produced in response to discovery requests
Plaintiff FIEL	All documents produced in response to discovery requests
Plaintiff LULAC Texas	All documents produced in response to discovery requests
Plaintiff Voto Latino	All documents produced in response to discovery requests
Plaintiff Texas Alliance for Retired Americans	All documents produced in response to discovery requests
Plaintiff Texas AFT	All documents produced in response to discovery requests
Plaintiff Mi Familia Vota	All documents produced in response to discovery requests
Plaintiff OCA-Greater Houston	All documents produced in response to discovery requests
Plaintiff League of Women Voters of Texas	All documents produced in response to discovery requests
Plaintiff REVUP Texas	All documents produced in response to discovery requests
Plaintiff Texas Organizing Project	All documents produced in response to discovery requests
Plaintiff Workers Defense Action Fund	All documents produced in response to discovery requests
Plaintiff Houston Area Urban League	All documents produced in response to discovery requests
Delta Sigma Theta Sorority, Inc.	All documents produced in response to discovery requests
Plaintiff The Arc of Texas	All documents produced in response to discovery requests
Representative Stephanie Klick	All documents produced in response to 45 subpoenas.
Senator Bryan Hughes	All documents produced in response to 45 subpoenas.
Representative Andrew Murr	All documents produced in response to 45 subpoenas.
Representative Trent Ashby	All documents produced in response to 45 subpoenas.
Representative Briscoe Cain	All documents produced in response to 45 subpoenas.
Senator Paul Bettencourt	All documents produced in response to 45 subpoenas.

Deposition transcripts and all deposition exhibits	<p>All parties have—or have had an opportunity to receive—copies of all depositions and accompanying exhibits. Deponents include:</p> <p>LUPE LULAC OC-Greater Houston Mi Familia Vota The Arc of Texas Workers Defense Action Fund HAUL REVUP League of Women Voters Delta Sigma Theta Jeffrey Lamar Clemmons James Lewin Isabel Longoria Michael Scarpello Jacquelyn Callanen Lisa Wise Yvonne Ramon Rebecca Guerrero Dana DeBeauvoir Travis County Clerk Office Lina Hidalgo Chris Hollins Remi Garza Representative Rafael Anchia Wendy Salome Dr. Kara B. Ayers Dr. William G. Eggington Dr. Eitan Hersh Tammy Patrick Dr. Douglas L. Kruse Dr. J. Morgan Kousser Dr. Daniel A. Smith Dr. Allan Lichtman Dr. Kenneth R. Mayer Dr. Loren Collingwood Dr. Andres Tijerina Dr. Eric McDaniel Dr. Franita Tolson Christian R. Grose John Schott Keith Ingram Christina Adkins Jonathan White Texas Secretary of State</p>
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	Texas Department of Public Safety Mark Hoekstra Briscoe Cain Bryan Hughes Andrew Murr Ruth Hughes Stephen C. Graves
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- III. A computation of each category of damages claimed by the disclosing party, who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material (unless privileged or protected from disclosure) on which each computation is based, including materials bearing on the nature and extent of injuries suffered.**

Not applicable.

- IV. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Not applicable.

Date: May 13, 2022

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Respectfully submitted.

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COUNSEL FOR STATE DEFENDANTS

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was emailed to all counsel of record on May 13, 2022, and that counsel consented to be served by email.

Patrick K. Sweeten
PATRICK K. SWEETEN